

Cardillo & Corbett
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RAETSCLUB MARINE INSURANCE B.V., :
: ECF
Plaintiff, :
: AFFIDAVIT PURSUANT
-against- :
: TO SUPPLEMENTAL
BULKSHIP (NIGERIA) LTD. and B.S. :
MARITIME SERVICE, :
: RULE B
: 08 Civ. 1081(LTS)
Defendants. :
-----x

STATE OF NEW YORK)

: ss.:

COUNTY OF NEW YORK)

JAMES P. RAU, being duly sworn, deposes and says:

1. I am a member of the Bar of this Court and a member of the firm of Cardillo & Corbett, attorneys for the Plaintiff herein. I am familiar with the facts of this case and make this affidavit in support of Plaintiff's prayer for the issuance of a Writ of Maritime Attachment and Garnishment, pursuant to Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

2. I have attempted to locate defendant, BULKSHIP (NIGERIA) LTD. and B.S. MARITIME SERVICE, within this District. As part of my investigation to locate the Defendants within this District, I examined the telephone company information directory, as well as the white and yellow pages of New York listed on the Internet or World Wide Web, and did not find any listing for the Defendants.

3. The database of the office of the New York State Secretary of State was searched to determine if Defendants are qualified to do business in New York, without result.

4. On information and belief, Defendants, BULKSHIP (NIGERIA) LTD. and B.S. MARITIME SERVICE, were and still are, foreign corporations, or other business entities, organized under, and existing by virtue of foreign law, with an address at 22 Creek Road, APAPA Nigeria.

5. In consequence of these inquiries your deponent believes that the Defendants cannot be found within the Southern District of New York.

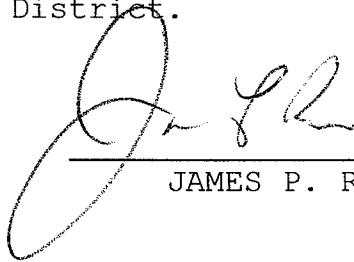
6. Upon information and belief, Defendants have, or will have during the pendency of this action, tangible and intangible property within the District in the hands of ABN Amro Bank NV, American Express Bank, Bank of America, Bank of China, Bank of Communications Co. Ltd. New York Branch, Bank of New York, Barclays Bank, BNP Paribas, Citibank, Deutsche Bank,

HSBC (USA) Bank, J.P. Morgan Chase, Standard Chartered Bank, UBS AG and/or Wachovia Bank, in the form of accounts and/or fund transfers identified as follows:

- a) accounts in the name of BULKSHIP (NIGERIA) LTD. and/or B.S. MARITIME SERVICE, or
- b) electronic funds transfers listing BULKSHIP (NIGERIA) LTD. and/or B.S. MARITIME SERVICE as a beneficiary of the funds transfer, or
- c) electronic funds transfers showing BULKSHIP (NIGERIA) LTD. and/or B.S. MARITIME SERVICE as the remitting party or ordering customer.

7. This is RAETSCLUB MARINE INSURANCE B.V.'s first request for this relief.

WHEREFORE, RAETSCLUB MARINE INSURANCE B.V., respectfully requests that the Court authorize the issuance of process in the form of a Writ of Maritime Attachment and Garnishment seeking attachment and garnishment of BULKSHIP (NIGERIA) LTD.'s and B.S. MARITIME SERVICE's tangible and intangible property within this District.



JAMES P. RAU

Sworn to before me this
1st day of February, 2008



NOTARY PUBLIC
CHRISTOPHIL B. COSTAS
Notary Public, State of New York
No. 31-0773693
Qualified in New York County
Commission Expires April 30, 2011